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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
PHYLLIS THOMAS, )  
 )  
 )  
 )  
Defendant. )

Case No. CR-08-0205-WDB

**DECLARATION OF SARALA V.  
NAGALA IN SUPPORT OF UNITED  
STATES' MOTION FOR SUMMONS**

I, Sarala V. Nagala, hereby declare as follows:

1. I am Law Clerk assigned to this case. I have received the following information from agents employed by the Social Security Administration Office of the Inspector General (SSA/OIG) and from reports and other documents provided to me by the SSA/OIG.

2. Phyllis Thomas' mother, Dollie Rawlins, died on June 14, 2004. Rawlins' monthly Social Security payments were inadvertently continued until late 2007. These monthly payments were deposited directly into Rawlins' bank account.

3. Between June 2004 and June 2005, Phyllis Thomas accessed her deceased mother's bank account using her mother's checks and ATM card. She used money in the account for various

1 expenses, including personal expenses.

2 4. On December 28, 2007, Special Agents Virgil Kay and Robb Stickley of SSA/OIG  
3 interviewed Thomas at her home. She voluntarily admitted that she had used money from her  
4 mother's bank account between June 2004 and June 2005 and that she knew her mother was not  
5 entitled to Social Security benefits after her death.

6 5. I declare under penalty of perjury that the foregoing is true and correct to the best of my  
7 knowledge and belief.

8  
9 Executed April 2, 2008 at Oakland, California.

10  
11 DATED: 4/2/08

Respectfully submitted,

12 JOSEPH P. RUSSONIELLO  
13 United States Attorney

14 /s/

15 SARALA V. NAGALA  
16 Law Clerk  
17 United States Attorney's Office  
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